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January 18, 2018

VIA ECF AND E-MAIL

Hon. Judge Cathy Seibel
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St., Courtroom: 621
White Plains, NY 10601-4150
chambersnysdseibel@nysd.uscourts.gov

Re: *Can't Stop Productions, Inc. v. Sixxvux, Ltd. et al.* 7:17-cv-06513-CS

Hon. Judge Seibel:

We represent the Defendants in the above referenced action. We write pursuant to rule 1.E of Your Honor's Individual Practices, to respectfully request a brief extension of Defendants' time to respond to Intervenor Willis' Motion to Stay the TRO [Docket No. 77] (the "Motion") to Monday January 22, 2018.

Ms. Willis filed the Motion on Friday January 12, 2018. Pursuant to the January 16, 2018 Order, Your Honor required that responses be filed no later than January 19, 2018. Defendants are respectfully requesting a brief extension to file their response until Monday, January 22, 2018.

The reason for this request is that one of our clients, Mr. Rose who is needed to aid in the preparation of the opposition and we anticipate submitting a declaration from has been traveling out of the country since January 11, 2018. He was supposed to return yesterday, however due to circumstances outside of his control his flight was cancelled and he is not returning until sometime late tonight. As such we are requesting this very brief extension so that we have adequate time to obtain the information and declaration we need from Mr. Rose.

Defendants have not requested any previous extensions of time to respond to this Motion. Counsel for Defendants have conferred with Ms. Willis and counsel for Plaintiff.

Plaintiff's counsel stated that Plaintiff neither supported, nor opposed the request.

In response to our email asking for consent Ms. Willis advised as follows "I will oppose the extension to January 22, 2017. The reason being is that there was a deadline of January 17, 2018

which was delayed by the court. If another delay is granted, I will move for a stay in the Second Circuit, likely before the close of the business day tomorrow (January 18, 2017).”

Defendants are not aware of any January 17, 2018 deadline to oppose the Motion. When we inquired as to why Ms. Willis believed this was the deadline she pointed to page 24 of her brief.

Defendants disagree that any response is due on January 17, 2018. Pursuant to Local Civil Rule 6.1(b), the response to the Motion would ordinarily have been due on January 26, 2018. Pursuant to the Court’s January 16, 2018 Order, however the Court ordered responses by January 19, 2018.

Defendants plan to submit a substantive response on the merits, and for the reason set forth above, are only requesting a very brief extension of the response deadline to Monday, January 22, 2018 instead of Friday January 19, 2018.

Furthermore, as the Motion does not identify any circumstances constituting an emergency that would be impacted by our opposition being filed on Monday January 22, 2018, instead of tomorrow. As such we are respectfully requesting that our request be granted.

We appreciate the Court’s time and consideration, and should Your Honor need any further information, we are available at the Court’s convenience.

Respectfully Submitted,

ADELMAN MATZ P.C.

A handwritten signature in black ink, appearing to be 'SM' with a stylized flourish.

Sarah M. Matz, Esq.

Cc. (Via ECF and E-Mail)
All Counsel of Record
Ms. Karen Willis